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Via Electronic Filing

November 16, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth St., S.W.
Washington, DC 20554

Re: Notice of Ex Parte Presentation – MB Docket No. 11-154

Dear Ms. Dortch:

This is to notify you that on November 16, 2011, Brian Markwalter, Bill Belt, and the undersigned, all of CEA, spoke by telephone with Jeffrey Neumann (MB), Alison Neplokh (MB), Diana Sokolow (MB), and Tom Apone (consultant to CGB).

During the call, CEA further discussed its views regarding interconnection mechanisms.¹ CEA explained that the Commission must narrowly interpret the scope of the CVAA's interconnection requirements.² CEA urged the Commission to clarify in its forthcoming rules that the proposed IP captioning requirements apply **only**:

- to video-capable interconnections, including analog video, compressed digital video and uncompressed digital video interconnections
- to devices subject to the IP closed captioning requirements
- when the interconnection is delivering “video programming”, as defined by the CVAA

¹ See Comments of CEA, MB Docket No. 11-154 (filed Oct. 18, 2011) (“CEA Comments”); Reply Comments of CEA, MB Docket No. 11-154 (filed Nov. 1, 2011) (“CEA Reply Comments”); *See also*, CEA *Ex Parte* Notices (filed Nov. 4, 2011 and Nov. 14, 2011).

² 47 U.S.C. § 303(z)(2).

In order to encompass the above points and to provide greater clarity for manufacturers, CEA proposes the following language for inclusion in the Commission's final rules:

“Every video output of a covered device must be capable of rendering or passing through closed captions when delivering “video programming”, as defined by the CVAA.”

CEA further explained that the CVAA clearly permits the rendering of captions in the source device and providing them as open captions to the display. We believe that rendering in the source device is likely to be the method of compliance for uncompressed digital video connections.

Pursuant to Section 1.1206 of the Commission's rules,³ this letter is being electronically filed with your office and a copy of this submission is being provided to the meeting attendees. Please let the undersigned know if you have any questions regarding this filing.

Respectfully submitted,

/s/ Julie M. Kearney

Julie M. Kearney
Vice President, Regulatory Affairs

cc: Jeffrey Neumann
Alison Neplokh
Diana Sokolow
Tom Apone

³ 47 C.F.R. § 1.1206.